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INITIAL ENVIRONMENTAL STUDY

ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

This environmental document is an Initial Study. The Initial Study was prepared for the proposed project by the Lead Agency as a means to identify any significant environmental effects and to determine whether an Environmental Impact Report or Negative Declaration should be prepared.

The County of Orange, OC Waste & Recycling (OCWR) department is the Lead Agency for the project and is also the project proponent that will be implementing the project. The contact person for this project is John Arnau, OCWR CEQA Manager, phone: (714) 834-4107, email: john.arnau@ocwr.ocgov.com.

OCWR Project Number: 678

1.1 PROJECT TITLE

Removal of Vegetation by Goats at the Former Gothard Street Landfill

1.2 PROJECT LOCATION AND EXISTING CONDITIONS

The former Gothard Street Landfill consists of two County-owned adjoining parcels of the former Gothard Street Landfill, which total approximately 11.5 acres in size and are located at 18131 Gothard Street in the City of Huntington Beach. The site is located approximately one-quarter mile south of Talbert Avenue, and is bounded by the former City of Huntington Beach Police Department shooting range to the west, the Burke development (i.e., commercial property) to the south, Gothard Street to the east and the Huntington Beach Sports Park to the north (i.e., softball fields). The location of the site is shown on **Figure 1**. The site has direct access from Gothard Street. The Gothard site has an unoccupied structure that faces Gothard Street that was formerly used as a food bank.

The former Gothard Street Landfill was part of a larger landfill site that encompassed approximately 33 acres that extended westerly toward Goldenwest Street. The County operated the 33-acre site as a burn site and landfill from 1947 – 1962. In June 1962, the County closed the landfill in accordance with regulatory requirements for landfill closure in effect at that time. This included the placement of a soil cover on top of the waste disposal area. In December 1963, the County deeded approximately 21.5 acres of the northern and western portion of the former landfill area to the City of Huntington Beach for park use, and retained ownership of the remaining 11.5 acres on the southeast side. The County continued to use the 11.5-acre site, constructing and operating a transfer station until these operations ceased in 1982. In 1993, the County placed an additional soil cover on the 11.5-acre site in the vicinity of the former transfer station.

From September 2004 to April 2005, the County made additional site improvements to the 11.5-acre site, including demolition work (remainder of the transfer station), placement of engineered fill and site grading, storm water drainage and landfill gas collection/control system improvements and other miscellaneous improvements.

1.3 LAND USE DESIGNATIONS

Total Site Acreage: 11.5 acres

APN 111-071-35 (9.25 acres)

APN 111-071-37 (2.25 acres)

General Plan Land Use Designations (City of Huntington Beach):

APN 111-071-35: Industrial (I-F2-d)

APN-111-071-37: Open Space – Park (OS-P)

Zoning (City of Huntington Beach):

APN 111-071-35: Open Space – Park and Recreation (OS-PR)

APN-111-071-37: Open Space – Park and Recreation (OS-PR)

1.4 PROJECT DESCRIPTION

OCWR proposes to use goats to remove all vegetation from the 11.5-acre former Gothard Street Landfill site. This includes approximately 8 acres of coastal sage scrub (CSS) that is not currently occupied by any Federal or State endangered or threatened species. Protocol surveys for the coastal California gnatcatcher were performed in 2018, which showed that there are no coastal California gnatcatchers at the site. The CSS is not native to the site and was installed by OCWR in the late 1980's as part of an erosion control mix. The CSS was originally hydroseeded on the westerly portion of the site, but has since spread to the entire site. Current photos of the site are shown on **Figure 2**. Should the CSS at the Gothard site become occupied by Federal or State endangered or threatened species in the future, this could result in OCWR not being able to perform post-closure maintenance activities during the nesting bird season, such as re-grading areas of the landfill affected by seasonal rainfall and erosion, which is necessary to protect public health and safety.

In order to provide full compensatory mitigation for the loss of CSS at the Gothard site, OCWR will enter into a Mitigation Agreement with the Irvine Ranch Conservancy to implement a CSS restoration project in Crystal Cove State Park. Vegetation removal at the Gothard site will occur after the nesting bird season in September 2019. Once the vegetation is removed from the site, the site will be hydroseeded with an annual grassland mix to minimize erosion. It is estimated that the goats will require no more than two months to remove all of the vegetation on the Gothard site. The project does not propose any new development for the former Gothard Street Landfill site. OCWR will continue to maintain the site as a former solid waste landfill. Any proposed future development proposal for the site will be required to comply with CEQA and will also be required to obtain land use approvals/entitlements from the County of Orange and the City of Huntington Beach.

1.5 ENVIRONMENTAL DETERMINATION AND PROJECT APPROVAL

This Initial Study has been prepared pursuant to Section 15063 of the CEQA Guidelines, as amended. All analyses, conclusions, findings and determinations made herein represent the position of the County of Orange, OC Waste & Recycling, acting as the Lead Agency for CEQA compliance. This project is subject to approval by administrative action by the Lead Agency, OC Waste & Recycling. Comments received on the Initial Study will be considered during the OC Waste & Recycling review of and decision on the project. This Draft Initial Study/Mitigated Negative Declaration will be circulated for a period of 30 days for public review, pursuant to Section 15073 of the State CEQA Guidelines. The Initial Study/Notice of Intent Mailing List is included as **Appendix A**. The Mitigation Monitoring and Reporting Program (MMRP) for the proposed project is included as **Appendix B**.

Environmental Determination

Based on the analysis conducted in this Initial Study, the following has been determined:

Table 1: Environmental Determination

I find that there is no substantial evidence that the project will have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that although the proposed project could have a significant effect on the environment, revisions to the project or proposals have been made by or agreed to by the project proponent, that will avoid the effects or mitigate the effects to where no significant effects on the environmental will occur. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	
I find that the proposed project has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and County CEQA Guidelines. The proposed project is a component of the whole action analyzed in the previously adopted/certified CEQA document.	
I find that the proposed project has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and County CEQA Guidelines. Minor additions and/or clarifications are needed to make the previous documentation adequate to cover the project which are documented in this addendum to the earlier CEQA document (CEQA §15164).	

I find that the proposed project Has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and County CEQA Guidelines. However, there is important new information and/or substantial changes have occurred requiring the preparation of an additional CEQA document (ND or EIR) pursuant to CEQA Guidelines Sections 15162 through 15163.	
M 1, 27, 2010	
<u>March 26, 2019</u> Signature Date	
John Arnau, OCWR CEQA Manager	
Name	
1.6 RESPONSIBLE AGENCIES AND PERMITS	
The clearing of the unoccupied CSS at the former Gothard Street Landfill site and acceptar	ice of

the compensatory CSS mitigation site at Crystal Cove State Park will require the approval of the U.S. Fish and Wildlife Service and California Department of Fish and Game. The proposed compensatory CSS mitigation site at Crystal Cove State Park will also require the approval of the California State Parks Department.

1.7 CALIFORNIA NATIVE AMERICAN TRIBAL CONSULTATION

See Section 2.18.

FIGURE 1	
	Page 7

FIGURE 2	
	Page 8

2.0 ENVIRONMENTAL EVALUATION

This section of the Initial Study analyzes the potential for significant environmental impacts that may result from the removal of CSS by goats at the former Gothard Street Landfill (proposed project). This document incorporates the Environmental Checklist Form from Appendix G of the Orange County Local CEQA Procedures Manual.

For the evaluation of potential impacts associated with the proposed project, the questions in the checklist are stated and an answer is provided reflecting the analysis conducted of this impact. To each question, there are four possible responses:

- *No Impact* The proposed project will not have a measurable impact on the environment.
- Less Than Significant Impact The proposed project will have the potential for impacting the environment but at a level less than the significance criteria used to evaluate the impact.
- Less Than Significant With Mitigation Incorporated The proposed project will have a significant impact unless mitigation measures are implemented to reduce the impact to a less than significant level.
- Potentially Significant Impact The proposed project will have impacts considered significant and either (1) additional analysis is needed to identify specific mitigation measures to reduce this impact to a less than significant level, (2) feasible mitigation measures are not available to reduce this impact to a less than significant level, or (3) the impacts associated with the project are not known at this time and further analysis is needed. In these cases, preparation of an Environmental Impact Report (EIR) is required.

2.1 Aesthetics Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?				\boxtimes
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				

c) In non-urbanized areas, substantially degrade the exist visual character or quality of priews of the site and its surroundings? (Public views at those that are experienced from publicly accessible vantage point of the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	re m oints). d		
d) Create a new source of substantight or glare, which would adversely affect day or nighttiviews in the area?			\boxtimes
2.1 AESTHETICS. Would to Have a substantial adverse		ista?	

- Substantially damage scenic resources, including, but not limited to, trees, rock b. outcroppings, and historic buildings within a state scenic highway?
- In non-urbanized areas, substantially degrade the existing visual character or quality of c. public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The removal of vegetation by goats at the former Gothard Street Landfill will not result in an adverse effect on a scenic vista nor will the proposed project substantially damage scenic resources. In addition, the proposed project will not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The proposed project will not result in the development of any new buildings or structures. The site has an existing block wall that fronts Gothard Street and tall trees that provide screening. These will remain unaffected by the proposed project. No aesthetic impacts will occur.

d. Create a new source of substantial light or glare, which adversely affect day or nighttime views in the area.

No Impact

Removal of the existing vegetation by goats at the former Gothard Street Landfill will occur during daylight hours only. No artificial lighting will be utilized. Since the project will not result in the

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development of any new building or structures there will be no potential glare or shade/shadow impacts. No impacts will occur.

2.2 Wo	Agriculture and Forestry Resources uld the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code 12220 (g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51004)(g))?				
d)	Result in the loss of forest land or conversion of forest land to non-forest use?				
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?				\boxtimes

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2.2 AGRICULTURE & FORESTRY RESOURCES. Would the project:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?
- d. Result in the loss of forest land or conversation of forest land to non-forest use?
- e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact

The project site is located entirely on a former solid waste landfill site, and would not affect Farmlands listed as "Prime", "Unique" or of "Statewide Importance" as shown on the State Farmland Mapping and Monitoring Program. The project would not result in any conflicts with Williamson Act contracts nor would the project involve the conversion of farmlands to a non-agricultural use. No impacts to agricultural resources would occur. In addition, the proposed project would not result in any conflicts with forest land, timberland or Timberland Production areas. Also, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. No impacts to forest land would occur.

2.3 Air Quality Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?				\boxtimes
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?				\boxtimes

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c) Expose sensitive receptors to substantial pollutant concentrations?		\boxtimes
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?		

2.3 AIR QUALITY. Would the project:

- a. Conflict with or obstruct implementation of the applicable air quality plan?
- b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?
- c. Expose sensitive receptors to substantial pollutant concentrations?
- d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Impact

The proposed removal of vegetation at the former Gothard Street Landfill will not result in any significant air emissions as there will be construction equipment used for the project. The project will therefore not conflict or obstruct the implementation of an applicable air quality plan. In addition, the proposed project will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. The project will not expose sensitive receptors to substantial pollutant concentrations. Also, the project will not result in other emissions adversely affecting a substantial number of people. No impacts to air quality will occur.

The former Gothard Street Landfill has an existing landfill gas collection and monitoring system that is regulated by the South Coast Air Quality Management District and the Orange County Health Care Agency, Environmental Health Division, acting in its role as the Local Enforcement Agency (LEA) for the California Department of Resources Recycling and Recovery (CalRecycle). The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not result in any impacts to the existing landfill gas collection and monitoring system. No impacts to air quality will occur.

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2.4 Biological Resources Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status specie in local or regional plans, policie or regulations, or by the California Department of Fish ar Wildlife or U.S. Fish and Wildlift Service?	s, d			
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fis and Wildlife or U.S. Fish and Wildlife Service?				
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				\boxtimes
e) Conflict with any local policies of ordinances protecting biological resources, such as a tree preservation policy or ordinance.				

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2.4 BIOLOGICAL RESOURCES. Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Services?

Less Than Significant with Mitigation Incorporated

OCWR proposes to use goats to remove all vegetation from the 11.5-acre former Gothard Street Landfill site. This includes approximately 8 acres of coastal sage scrub (CSS) that is not currently occupied by any Federal or State endangered or threatened species. Protocol surveys for the coastal California gnatcatcher was performed in 2018, included as **Appendix C**, which showed that there are no coastal California gnatcatchers at the site. Protocol surveys for the gnatcatcher were also performed in 2000, 2004 and 2015. All of these previous protocol surveys indicated that there were no coastal California gnatcatchers at the Gothard site. The CSS is not native to the site and was installed by OCWR in the late 1980's as part of an erosion control mix. The CSS was originally hydroseeded on the westerly portion of the site, but has since spread to the entire site. Current photos of the site are shown on **Figure 2**. A listing of other species found at the Gothard site are included in **Appendix C**.

In order to provide compensatory mitigation for the loss of other species located at the Gothard site, OCWR will contract with the Irvine Ranch Conservancy to implement a CSS restoration project in Crystal Cove State Park that will restore 4.88 acres of coastal CSS as compensatory mitigation for the loss of the CSS at the Gothard site. The rationale for the proposed impact to mitigation ratio is included in **Appendix D**. The conceptual CSS restoration plan at Crystal Cove State Park is included as **Appendix E**. Vegetation removal at the Gothard site will occur after the nesting bird season in September 2019. Once the vegetation is removed from the site, the site will be hydroseeded with an annual grassland mix to minimize erosion. It is anticipated that the removal of all of the vegetation on the project site by goats will take approximately two months. The project does not propose any new development for the former Gothard Street Landfill site. OCWR will continue to maintain the site as a former solid waste landfill. With the incorporation of the mitigation measure below to restore CSS at Crystal Cove State Park, the loss of CSS at the former Gothard Street Landfill will result in a less than significant impact.

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Mitigation Measure BR-1

- In order to fully mitigate for the loss of approximately 8 acres of unoccupied CSS at the former Gothard Street Landfill site, OCWR will contract with the Irvine Ranch Conservancy to restore 4.88 acres of coastal CSS at Crystal Cove State Park.
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact

The former Gothard Street Landfill site does not have any riparian habitat or any areas designated as having federal or state jurisdictional waters. Therefore, the removal of existing vegetation by goats at the former Gothard Street Landfill site will not result in any impacts.

c. Have a substantial effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact

The former Gothard Street landfill site does not have any wetlands on-site, including any state or federally protected wetlands. Therefore, the removal of existing vegetation by goats at the former Gothard Street Landfill site will not result in any impacts.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact

The removal of vegetation by goats at the former Gothard Street Landfill site will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The removal of the vegetation at the former Gothard Street Landfill site will occur after the nesting bird season, to ensure that there are no impacts to nesting birds. No impacts will occur.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not conflict with any local policies or ordinances protecting biological resources, such as a tree

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preservation policy or ordinance. The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not result in the removal of oak trees or other trees subject to a local tree ordinance. No impacts will occur.

f. Conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact

The former Gothard Street Landfill site not located within an adopted Habitat Conservation Plan area, Natural Community Conservation Plan area or other approved local, regional, or state habitat conservation planning area. No impacts will occur.

2.5 Wou	Cultural Resources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
i	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				\boxtimes
i	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?				
i	Disturb any human remains, including those interred outside of dedicated cemeteries?				\boxtimes

2.5 CULTURAL RESOURCES. Would the project:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No Impact

The proposed project would not result in any disturbance to historical resources, as defined in Section 15064.5 of the CEQA Guidelines, as there are no historical structures located on the proposed project site. The removal of vegetation by goats will occur entirely at the former Gothard Street Landfill site that is underlain entirely by refuse. No impacts to historical resources will occur.

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- b. Cause a substantial change in the significance of an archaeological resource pursuant to Section 15064.5?
- c. Disturb any human remains, including those interred outside of formal cemeteries.

The proposed project will not result in the disturbance to any archaeological resources, nor will the project result in the disturbance to any human remains. The removal of vegetation by goats will occur entirely at the former Gothard Street Landfill site that is underlain entirely by refuse. No impacts to archaeological resources will occur.

2.6 Energy Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				\boxtimes
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				

2.6 ENERGY. Would the project:

- a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not result in the use of heavy construction equipment. Therefore, the proposed project will not result in the wasteful, inefficient or unnecessary consumption of energy resources during project construction or operation. In addition, the project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No impacts will occur.

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2.7 Geology and Soils Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
 a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. 				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:ii) Strong seismic ground shaking?				\boxtimes
 a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: iii) Seismic-related ground failure, including liquefaction? 				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: iv) Landslides?				\boxtimes
b) Result in substantial soil erosion or the loss of topsoil?			\boxtimes	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?				

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			Page 20			
		Sothard Street Landfill is a s regularly inspected and n	_			•
No I	mpact					
	iv)	Landslides?				
esul Ther	t in the o	d removal of vegetation by development of any structure known earthquake faults uefaction. No impacts will	res that could b located on the	e subject to stro	ng seismic gro	ound shak
No I	mpact					
	iii)	Seismic-related ground f	ailure, includin	g liquefaction?		
	ii)	Strong seismic ground sh	naking?			
	i)	Rupture of a known ear Priolo Earthquake Fault based on other substantia and Geology Special Pub	Zoning Map is al evidence of a	sued by the Sta	te Geologist f	for the area
2.7 a.	Direc	tly or indirectly cause pote v, or death involving:	Vould the proje		s, including th	ne risk of l
f)	unique	or indirectly destroy a paleontological resource or inique geologic feature?				
e)	support or altern system	oils incapable of adequately ing the use of septic tanks native waste water disposal where sewers are not e for the disposal of waste				\boxtimes
,	defined Uniform creating	ted on expansive soil, as in Table 18-1-B of the n Building Code (1994), g substantial direct or risks to life or property?				\boxtimes

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact

The proposed project will result in the removal of all vegetation on the project site which could lead to a temporary increase in soil erosion. However, after the removal of the vegetation by goats, OCWR will hydroseed the entire site with an annual grassland mix to reduce the potential for soil erosion. In addition, OCWR routinely maintains the former landfill site to ensure that any ponded areas or areas of soil erosion are immediately repaired. No significant impacts will occur.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

No Impact

See 6a - i-iii, above.

d. Be located on expansive soils, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

No Impact

The former Gothard Street Landfill site is not underlain by expansive soils. In addition, the proposed removal of vegetation by goats at the former Gothard Street Landfill site would not result in the development of any new structures at the site. No impacts will occur.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system where sewers are not available for the disposal of waste water?

No Impact

The project will not result in the development or use of any septic or wastewater treatment systems. No impacts will occur.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact

The former Gothard Street Landfill site is entirely underlain by refuse. No impacts to paleontological resources will occur.

2.8 Greenhouse Gas Emissions Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment?				\boxtimes
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				

2.8 GREENHOUSE GAS EMISSIONS. Would the project:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not result in the use of any heavy construction equipment. Therefore, the project will not result in any significant greenhouse gas emissions nor would the project conflict with an applicable plan, polity or regulation adopted for the purpose of reducing the emissions of greenhouse gases. No impacts will occur.

2.9 Hazards and Hazardous Materials Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				\boxtimes

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o.	Create a significant hazard to the foreseeable upset and accident c into the environment.	•		-	•
2.9 a.	HAZARDS & HAZARDOUS Create a significant hazard to thuse or disposal of hazardous ma	e public or the	•	•	tine transport,
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				\boxtimes
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not result in the use or transport of hazardous materials. No construction equipment will be used for the proposed project. In addition, the proposed project will not create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. No impacts will occur.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact

The proposed removal of vegetation by goats will not result in any hazardous emissions or result in the handling of hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school. No impacts will occur.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact

The former Gothard Street Landfill site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impacts will occur.

e. For a project located within an airport land use plan or, where such plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact

The former Gothard Street Landfill site is not located within an airport land use plan area or otherwise in proximity to an airport. No impacts will occur.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No impacts will occur.

g.	Expose people or structures, either directly or indirectly, to a significant risk or loss, inju-	ıry
	or death involving wildland fires?	

The proposed removal of vegetation at the former Gothard Street Landfill site will not expose people or structures, either directly or indirectly, to a significant risk or loss, injury or death involving wildland fires. No impacts will occur.

2.10 Hydrology and Water Quality Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?				
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner, which would: (i) result in substantial erosion or			\boxtimes	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner, which would: (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				

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c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner, which would: (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner, which would: (iv) Impede or redirect flood flows?				
d) In flood hazard, tsunami or seiche zones, risk release of pollutants due to project inundation?				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				
a. Violate any water quality standard substantially degrade surface. No Impact The proposed removal of vegetation by result in the violation of any water quality otherwise substantially degrade surface maintain the landfill cover and the surface degradation of water quality. No impact to the surface substantially decrease groundware the surface such that the project is the surface.	andards or wast ce or groundwards of goats at the for ity standards of or groundwate ace water drains cts will occur.	rmer Gothard St waste discharg r quality. OCW age system to en	reet Landfill se requirement R will continusure that ther	site will not as or ue to e is no
basin?	Page _			
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The proposed removal of vegetation by goats at the former Gothard Street Landfill will not result in a substantial decrease in groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The proposed project will not result in a permanent large use of water, the use of well water, nor will the project result in the development of any impervious surfaces. No impacts will occur.

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:
 - (i) Result in substantial erosion or siltation on- or off-site?

Less than Significant Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site could result in a temporary increase in the generation of erosion or siltation. However, immediately after the removal of the vegetation by goats, OCWR will hydroseed the entire landfill site with an annual grassland mix to reduce erosion and siltation. In addition, OCWR routinely maintains the landfill cover and surface water drainage system to further minimize erosion and siltation. No significant impacts will occur.

(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not result in a substantial increase in the rate or amount of surface water runoff in a manner which would result in flooding on- or off-site. No impacts will occur.

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. OCWR routinely maintains the landfill cover and surface water drainage system to ensure that no impacts from polluted runoff will occur. No impacts will occur.

(iv) Impede or redirect flood flows?

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The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not impede or redirect flood flows. OCWR routinely maintains the landfill cover and surface water drainage system. No impacts will occur.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact

The former Gothard Street Landfill site is not located in a flood hazard, tsunami or seiche zone. No impacts will occur.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill will not result in the obstruction of any water quality control plan or sustainable groundwater management plan. No impacts will occur.

2.11 Land Use and Planning Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?				\boxtimes
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				

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2.11 LAND USE & PLANNING. Would the project:

a. Physically divide an established community?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill will not physically divide an established community. The proposed project does not involve the development of any building or structures. No impacts will occur.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill will not cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The proposed project does not involve the development of any building or structures, nor will the project result in the development of any impervious surfaces. No impacts will occur.

2.12 Mineral Resources Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				

2.12 MINERAL RESOURCES. Would the project:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state?
- b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

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The proposed project would not result in any impacts to mineral resources. The former Gothard Street Landfill site does not contain mineral resources that are either designated as important to the State of California or are considered to be of local importance. In addition, the landfill site is not designated as a mineral resource recovery facility. The project site is entirely underlain by refuse. No impacts will occur.

2.13 Noise Would the project result	t in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generation of a sub- temporary or perma ambient noise levels of the project in exc established in the lo or noise ordinance, standards of other a	nent increase in s in the vicinity sess of standards scal general plan or applicable				
b) Generation of exces groundborne vibrati groundborne noise l	on or				\boxtimes
c) For a project located vicinity of a private airport land use plar a plan has not been two miles of a public use airport, we project expose peop working in the project excessive noise lever	airstrip or an n or, where such adopted, within te airport or would the ole residing or ect area to				

2.13 NOISE. Would the project result in:

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill will not result in any temporary or permanent noise impacts. The project will not involve the use of construction equipment and the project will occur during daylight hours only. No impacts will occur.

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b	Generation	of excessi	ve ground	l borne	vibration	or ground	borne nois	se levels?
· .	Comoration	OI OHIOODDI	, , ,		, ioiution	or ground	come mon	

The proposed removal of vegetation by goats at the former Gothard Street Landfill will not result in any ground borne vibration impacts or impacts from ground borne noise levels. The project will not involve the use of construction equipment and the project will occur during daylight hours only. No impacts will occur.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact

The former Gothard Street Landfill site is not located within the vicinity of a private airstrip or within an airport land use plan, or within two miles of a public airport or public use airport. In addition, the proposed project would not result in the development of any occupied structures at the project site. No impacts will occur.

2.14 Population and Housing Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				\boxtimes
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				

2.14 POPULATION AND HOUSING. Would the project:

a. Induce substantial unplanned population growth in the area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact

The proposed project would not induce substantial unplanned population growth, either directly or indirectly. The proposed project would not result in the development of any new homes or businesses, nor would the project result in the expansion of any major utilities or public facilities that would serve future population or employment growth. No impacts will occur.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact

The proposed project will not result in the displacement of existing people, housing or businesses as a result of the project. No impacts will occur.

2.15 Public Services Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact		
altered governmental facilities, need construction of which could cause sign	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public					
a-i) Fire protection?				\boxtimes		
a-ii) Police protection?				\boxtimes		
a-iii) Schools?				\boxtimes		
a-iv) Parks?				\boxtimes		
a-v) Other public facilities?				\boxtimes		

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2.15 PUBLIC SERVICES. Would the project:

- a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
 - i) Fire protection?
 - ii) Police protection?
 - iii) Schools?
 - iv) Parks?
 - v) Other public facilities?

No Impact

The proposed project would not result in any new residential, commercial or industrial developments that would increase the need for fire protection and police protection services, the building of new schools and parks or the need for either expanded or enhanced public facilities and services. No impacts will occur.

2.16 Recreation Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				\boxtimes
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				

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2.16 RECREATION. Would the project:

- a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?

No Impact

The proposed project would not result in any new residential, commercial or industrial developments that would increase the need for new recreational facilities or increase the use of existing recreational facilities. No impacts will occur.

2.17 Transportation Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064, subdivision (b)?				
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
d) Result in inadequate emergency access?				

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2.17 TRANSPORTATION/TRAFFIC. Would the project:

a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The proposed project will not result in the development of any residential, commercial or industrial developments or structures. In addition, the project will generate a very limited number of vehicle trips, primarily to transport the goats to the site, and removal of the goats from the site after the goats have removed all of the vegetation. No impacts will occur.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064, subdivision (b)?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not conflict with or be inconsistent with CEQA Guidelines section 15064, subdivision (b). The proposed project will not result in the development of any residential, commercial or industrial developments or structures. In addition, the project will generate a very limited number of vehicle trips, primarily to transport the goats to the site, and removal of the goats from the site after the goats have removed all of the vegetation. No impacts will occur.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not substantially increase hazards due to a geometric design feature or incompatible uses. No impacts will occur.

d. Result in inadequate emergency access?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will result in a very limited number of new vehicle trips associated with the transport of goats to and from the project site. The project will not result in the development of any new residential, commercial or industrial developments. Therefore, the project would not cause or result in inadequate emergency access. No impacts will occur.

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Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a-i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?				
a-ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				

- **2.18 TRIBAL CULTURAL RESOURCES.** Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- a-i). Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?
- a-ii). A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

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The proposed removal of vegetation by goats will occur at the former Gothard Street Landfill. The entire site is underlain by refuse. Therefore, there is no possibility that tribal cultural resources will be present or will be disturbed. In compliance with AB 52, OC Waste & Recycling sent letters to four Native American tribes whose historic ranges included the area where the proposed project is located, in order to determine if any of these Native American tribes would request that they provide consultation on the potential for impacts to Native American tribal resources for the proposed project. These letters are included as **Appendix F**. OC Waste & Recycling did not receive any comments or a request for consultation from any of the four Native American tribes. As such, no impacts to tribal resources will occur.

2.19 Utilities and Service Systems Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				\boxtimes
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				\boxtimes

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e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				
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2.19. UTILITIES & SERVICE SYSTEMS. Would the project:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities. The proposed project will not result in the development of any residential, commercial or industrial developments or structures, nor will the project result in the development of any impervious surfaces. No impacts will occur.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not result in any impacts to existing or future water supplies. The proposed project will not result in the development of any residential, commercial or industrial developments or structures, nor will the project result in the development of any impervious surfaces. No impacts will occur.

c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not result in any impacts to sewers or wastewater treatment facilities as the project will not generate wastewater. The proposed project will not result in the development of any residential, commercial or industrial developments or structures, nor will the project result in the development of any impervious surfaces. No impacts will occur.

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- d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
 - e. Comply with federal, state and local management and reduction statutes and regulations related to solid waste?

The proposed removal of vegetation by goats at the former Gothard Street Landfill will not generate significant volumes of solid waste that would be in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. In addition, the proposed project would not result in any violations in compliance with federal, state and local management and reduction statutes and regulations related to solid waste. The proposed project will not result in the development of any residential, commercial or industrial developments or structures, nor will the project result in the development of any impervious surfaces. No impacts will occur.

,_	cocated in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?				
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				
c)	Require the installation or maintenance of associated infrastructure (such as road, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				

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d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire instability or drainage changes?				
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2.20. Wildfire. Would the project:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not substantially impair an adopted emergency response plan or emergency evacuation plan. The proposed project will not result in the development of any residential, commercial or industrial developments or structures, nor will the project result in the development of any impervious surfaces. No impacts will occur.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact

The proposed project will not exacerbate wildfire risks, expose project occupants to pollutant concentrations from a wildfire or cause the uncontrolled spread of a wildfire. The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not result in any impacts to existing or future water supplies. The proposed project will not result in the development of any residential, commercial or industrial developments or structures, nor will the project result in the development of any impervious surfaces. No impacts will occur.

c. Require the installation or maintenance of associated infrastructure (such as road, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not require the installation or maintenance of associated infrastructure that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment. The proposed project will not result in the development of any residential, commercial or industrial developments or structures, nor will the project result in the development of any impervious surfaces. No impacts will occur.

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d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire instability or drainage changes?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill site will not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire instability or drainage changes. The proposed project will not result in the development of any residential, commercial or industrial developments or structures, nor will the project result in the development of any impervious surfaces. No impacts will occur.

2.21 Mandatory Findings of Significance Would the project:		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				\boxtimes

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2.21 MANDATORY FINDINGS

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill will not substantially reduce the habitat of a fish or wildlife population, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. In addition, the proposed project would not eliminate important examples of the major periods of California history or prehistory. The proposed project will be developed entirely on a former refuse area.

b. Does the project have possible environmental effects, which are individually limited but cumulatively considerable? ("cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

No Impact

The proposed removal of vegetation by goats at the former Gothard Street Landfill will not result in any environmental impacts that would be individually limited but cumulatively considerable. The proposed project will not result in the development of any residential, commercial or industrial developments or structures, that could potentially contribute to cumulative impacts, nor will the project result in the development of any impervious surfaces. Therefore, the project will not result in any cumulatively considerable environmental impacts.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

No Impact

The analyses included in Sections 2.1 - 2.20 above shows that the proposed removal of vegetation by goats at the former Gothard Street Landfill site would not result in any substantial adverse effects on human beings, either directly or indirectly. No impacts will occur.